

**MONTANA BOARD OF
PRIVATE ALTERNATIVE ADOLESCENT
RESIDENTIAL OR OUTDOOR
PROGRAMS**

September 12, 2006

Report of Findings to the

**MONTANA LEGISLATIVE
ECONOMIC AFFAIRS INTERIM
COMMITTEE**

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**MONTANA BOARD OF
PRIVATE ALTERNATIVE ADOLESCENT RESIDENTIAL OR OUTDOOR
PROGRAMS**

**SUMMARY OF THE REPORT OF FINDINGS AND RECOMMENDATIONS
to the Montana Legislative Economic Affairs Interim Committee
September 12, 2006**

SUMMARY

The PAARP Board has had approximately one year to examine the benefit of licensing private alternative adolescent residential or outdoor programs and to prepare this report to the 2007 Interim Committee on Economic Affairs. The Board's primary objective is to determine what is in the best interest of the participants and families utilizing the services of these programs. Over ninety percent of the students participating in private programs in Montana are from out of state. Tuition is privately funded. The programs do not receive funding from the State of Montana and other governmental agencies. In alignment with the public good, the Board takes seriously its charge to determine the quality of care and education received by participants.

The Board established an effective procedure for collecting data to complete their mandate. The first tasks included adopting rules and setting up a registration process. Of the twenty-nine programs in Montana, twenty-four (83%) registered. The primary objective of the lengthy registration form was to supply information regarding the description of each program; the location, the number, and description of participants enrolled; and the names and contact information of the people in charge of the operation. The registration process also provided additional information such as policies regarding admission guidelines, family communication, medication management, behavioral management, and grievance procedures. Some of the information from the completed registration form was placed on a web page established by the Board and the Department of Labor and Industry.

The Board also designed and submitted an extensive survey to the programs. Seventeen programs returned the survey with a wide range of information to help prepare this report. The board conducted thirteen site visits and had two town hall meetings in Trout Creek and Kalispell respectively, which are central locations to a majority of the programs.

The Board found a wide range of programs utilizing varied approaches when dealing with the adolescents enrolled in their programs. All the programs directly provide (or provide access to) educational and medical services. Very few programs exclusively utilize public schools. Some programs have therapy on their campuses, and others provide access to professionals in the community. Most programs use levels and points in a system of rewards and consequences to mark progress and to apply positive discipline. The average length of time participants stay in a program is between twelve and eighteen months, and each day is structured around school, recreational, and personal

time. The majority of the programs have fewer than fifty teen-age participants. The programs are rich in personnel with an average of one staff person to between two and five students. Many staff have specialized degrees and licenses.

Despite various approaches and philosophies, there are many similarities in private programs. Parents make critical decisions throughout their teen's stay in the programs. These decisions include determining the placement of their child, working with staff to develop and refine a plan for their teen and the family, and determining their child's length of stay. Communication with family members is important in all programs. The focus for most of these programs is to reunite families.

The programs have a significant economic impact on the communities in which they are located beyond the services they often provide through volunteer projects. By studying the data provided by the programs and using conservative projections, some financial implications can be made. The salaries paid by the programs are estimated to total \$17,850,000.00 per year. The parents, traveling to see their children, spend about \$1,530,914.45 each year. Money spent by the programs on the participants adds up to approximately \$3,372,408.00 for a total impact in just these three areas of \$22,753,322.00.

The Board found no systemic problems such as lack of transparency or excessive disciplinary measures. Most programs report participation in one or more professional associations and accrediting bodies. Finally, the board feels that most of the informational questions regarding the quality of care provided in Montana have been addressed.

However, the board, while gathering a great deal of information and data, has found that there are additional questions, and there is a continued need for gathering and analyzing additional information. Work is still being done on the survey committee report. Information from the survey is presently available on the following link, <http://www.surveymonkey.com/DisplaySummary.asp?SID=1424839&U=142483945937>. At present, there is a lack of sufficient information to answer questions regarding recommendations listed below, numbered 4, 5, and 6. The Board believes continuing this work will provide a more thorough understanding of this new and innovative profession. Such an understanding will be advantageous as the board presents recommendations for creating effective public policies and program accountability. The Board found the programs to be generally cooperative and open to collaborative governance.

RECOMMENDATIONS

Based upon its work and analysis completed in the past year, the board respectfully offers the following recommendations:

1. Maintain the Board's current structure, operation, and responsibilities.
2. Amend Chapter 48 to include compliance authority to the mandatory registration.

3. Continue the work of collecting and analyzing information regarding the operation of programs. The diversity of the programs and their populations requires a more thorough understanding than the board has reached to date before it can recommend a comprehensive regulatory structure, if the Board determines that such a structure is needed to provide effective policies and rules that will monitor and maintain a high standard of care and ensure the safety and welfare of adolescents and parents using the programs.
4. Determine the current local, state and federal regulations that apply to the programs in order to avoid making recommendations that result in duplications.
5. Explore further the differences between public and private programs and the implications of such distinctions to regulatory issues.
6. Research options for efficient and effective methods of addressing public concerns, complaints, and maintaining program accountability.
7. Present the final report to the economic affairs interim committee detailing the board's findings, recommendations, and further proposed legislation, if any, by September 15, 2008.

Table A

PAARP Data from 24 Registration Applications**Business*****Registered As***

Private Alternative Adolescent Program	Outdoor Program	Neither – Faith-based choosing to join	Both Private Alternative Adolescent and Outdoor
19	3	1	1

Business Entity

Professional Corporation	7	S-Corp.	4	Limited Liability	3
Non Professional Corporation	7	501 c-3	1	Nonprofit Corporation	1
Incorporated in Idaho	1				

Business Status

Not for Profit	9	For Profit	15	In State	18	Out of State	5
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If Out of State – Where?

MT & WY	1	ID	1	OR	1
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Business Registered In MT

Yes	21	No	0	No Response	3
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Years in Business

1 year	1	2 years	1	3 years	2	4 years	2	5 years	5	6 years	2	7 years	1
8 years	1	9 years	2	10 years	3	11 years	1	13 years	2	16 years	1	No Res	2

Location – County

Sanders	11	Lincoln	4	Flathead	4	Gallatin	1
Missoula	1	Teton	1	Carbon	1	Hill	1

Website Listed on DLI Site

Yes	19	No	1	Don't Have	2	No Response	2
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Table A (Continued)
Participants

Census – number of students

0-10	13	11-50	7	51-100	3	101+	1
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Age

10-16	1	12-16	1	12-17	1	12-18	3	13-17	2	13-18	2
13-24	1	14-18	3	14-19	1	16-22	1			Not Given	8

Sex

Female Only	5	Male Only	8	Coed	10	Not Given	1
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Time in Program (months)

3 - 12	1	6 - 24	1	11 - 24	1	12	4	12 -18	1
12 - 18	1	12 - 24	1	45 Days	1	1-3 Weeks	1	Not Given	1

Schools

Public Only	3	On Site Only	14	Public/On Site	4
Private Only	0	Public/Private	1	N/A (outdoor)	2

Listed Medical Services Used by Participants

Hospitals	10	Dentist	11	Psychiatry	4
Doctors	27	Orthodontist	4	Psychologist	5
Medical Clinics	25	Oral Surgeon	2	Psychiatric Clinic	6
Optometrist	4			Mental Hospital	1

Employees

List of Credentials & Degrees beyond High School

PhD	6	MD	5	MSW	4
MA	6	Psychiatrist	1	BSW	1
MS	3	Psychologist	5	LCSW	7
BS	15	RN	7	LCPC	11
BA	14	LPN	2	LAC	3
Admin Cred.	2	CNA	6	MFT	3
Special Ed Cred.	1	ASN	1	CDCI	1
Teaching Cred.	47	EMT	2	NCAC	2
Guidance Counsel.	3	Pharmacy Tech	2		
AA	6	Licensed Contractor	1		

Table A (Continued)

Accrediting Agencies

NAME	# of MEMBERSHIP
Northwest Association of Accrediting School – NAAS	4
National Private Schools Accrediting Association – NPSAA	2
National Private School Accreditation Alliance	1
Office of Public Instruction – OPI	1
Accrediting Association International – AAI	1
Alger Learning	1
Blueprint Education	1
Wyoming Dept. of Family Services	1
Russian Federation	1

Association Memberships

MT Alternative Adolescent Programs – MAAPP	12
National Assoc. of Therapeutic Schools & Programs –NATSAP	11
National Independent Private School Association – NIPSA	2
Pacific Northwest Association of Independent Schools - PNAIS	1
National Association of Addiction Treatment Providers	1
Independent of Small Program Alliance – ISPA	1
Association of Experimental Education - AEE	2
Outdoor Behavioral Healthcare Industry Council – OBHIC	1
Association of Challenge Course Technology - ACCT	1
Joint Council on the International Child Services – JCICS	1
Coalition of Residential of Education – CRE	1
National Association of Christian Social Workers – NACSW	1
American Christian Counseling Association – ACCA	1
Kalispell Chamber of Commerce	2
Whitefish Chamber of Commerce	1
Flathead Chamber of Commerce	1
Independent Education Consultants Association – IECA	1

Table B

PAARP Town Hall Meeting Summary Report

Positive means supporting the move for this PAARP Board to move forward under the direction of DLI with some sort of future plan to support the public good regarding private programs with the recommendations stated in each person's public comments.

Negative means not in support of this PAARP Board to move forward and another plan be designed as outlined in their particular comments.

44 Positive and 2 Negative (Numbers below reflect how many people voiced the opinions listed.)

Overall repeated points made by those in a *positive* position:

- There is a need for regulation to protect and inform the public, and at the same time the regulations should allow for variability of choice to the parents for a best fit for their child. (26)
- Programs provide unique, structured services that are built upon the need to reestablish positive relationships with self, family, and others. (13)
- A board that contains members from the profession and community is endorsed, along with the possibility of a student board member. (3)
- The effect of the programs on the community has been positive in regards to jobs, taxes, tourism dollars, as well as the community services provided by the students. (14)
- Impact on public schools: brings dollars to the district when partnership is formed with program schools, brings diversity to the culture and climate of the school, and brings positive value-driven students to the campuses with a variety of interests, athletic, academic, and creative. (3)
- Need these kinds of programs where public schools cannot serve – students need to be pulled away from negative influences. (7)
- A concern that regulations not limit programs from the work they presently do, and this concern also stems from reviewing the regulations presently in force for state-run programs. They question the effectiveness of many of the present regulations in force. (15)
- Agree that licensure is needed – not sure about regulation. (1)
- Concerned with negative inaccurate information published regarding programs. (1)
- Concerned that programs do not fit in a medical model, especially concerning regulations (2)

Overall repeated points made by those in a *negative* position:

- Welcomes regulations - feels there should be guidelines and supervision. Concerned with present state of supervision and questions whether programs can adequately police themselves. (1)
- Does not want the state to regulate – feels the programs should totally regulate themselves under an association. (1)

Table C

PAARP Scheduled Meetings and Visits

9/8/05 – 9/8/06

Board Meetings	Committee Meetings	Site Visits	
9/8/05	10/3/05	20 Peaks	3/18/06
10/3/05	10/25/05	Clearview	3/19/06
10/25/05	11/08/05	Elk Creek	3/19/06
11/8/05	11/16/05	Building Bridges	3/19/06
11/16/05	12/1/05	Turnaround Ranch	3/20/06
1/5/06		Galena Ridge	3/20/06
1/26/06	Public Comment	Spring Creek	3/21/06
4/6/06	12/05	Chrysalis	7/19/06
6/15/06		Hope Ranch	7/19/06
6/29/06	Town Hall Meet	New Horizons	7/19/06
7/14/06	3/20/06	Ranch for Kids	7/19/06
7/31/06	7/20/06	MT Academy	7/20/06
8/10/06		Summit Academy	7/21/06
8/25/06			
9/8/06			

**MONTANA BOARD OF
PRIVATE ALTERNATIVE ADOLESCENT RESIDENTIAL OR OUTDOOR
PROGRAMS**

**REPORT OF FINDINGS
to the Montana Legislature
Economic Affairs Interim Committee
September 12, 2006**

The facts, opinions and recommendations of the Montana Board of Private Alternative Adolescent Residential or Outdoor Programs are the facts found by, and the opinions and recommendations of the Board and do not reflect facts found by or opinions and recommendations of the Department of Labor and Industry, Business Standards Division, Health Care Licensing Bureau (DLI). DLI staff was assigned to assist the Board solely on a clerical and administrative basis.

PURPOSE

This report details the work of the Private Alternative Adolescent Residential or Outdoor Programs Board over the past year and, pursuant to its legislative mandate, details the Board's findings, recommendations, and proposal for legislation to the Economic Affairs Interim Committee of the Montana Legislature.

HISTORY AND WORK OF THE NEW BOARD

House Bill 628 was passed by the 2005 Legislature and provided for the creation of the Private Alternative Adolescent Residential or Outdoor Programs Board (PAARP). The Board was allocated to the Department of Labor for administrative purposes and consists of five members, which were appointed by the Governor pursuant to Mont. Code Ann. § 2-15-1745 (2005). The initial appointments to the Board were Paul Clark of Trout Creek (Representative and private member from a small program), Michele Manning of Thompson Falls (private member from a large program), Mary Alexine of Eureka (private member from a medium program), Carol Brooker of Plains (public member and Sanders County Commissioner), and Dr. Maureen Neihart of Laurel (public member). The Board elected Paul Clark as Chair. The Board conducted its work with the assistance and direction of staff and legal counsel as assigned by the Department of Labor.

Pursuant to the statute:

The purpose of the Board is to examine the benefit of licensing private alternative adolescent residential or outdoor programs as a public service, to monitor and maintain a high standard of care and to ensure the safety and well being of adolescents and parents using the programs. Necessary licensure processes and safety standards for programs are best developed and monitored by the professionals that are actively engaged in providing private alternative adolescent residential care.

Mont. Code Ann. §37-48-101 (2005).

The legislation further assigned the Board the following responsibilities:

1. To develop and implement a process for registration of programs and to set fees to carry out its duties;
2. Examine data gathered from the registration process;
3. Examine current regulations and standards applicable to the programs;
4. Determine additional regulations and standards that are needed;
5. Examine the quality of childcare available at the various programs, any aspects of existing programs that need improvements, and the positive contributions to or negative interactions with local communities;
6. Determine the need for the continued existence of the Board and its duties or responsibilities;
7. Report to the Economic Affairs Committee detailing the Board's findings, recommendations and proposed legislation, if any, by September 15, 2006.

Mont. Code Ann. §37-48-103 (2005).

The Board and assigned Department of Labor staff had one year to complete a considerable amount of work as directed by House Bill 628. During this time, the Board met in public meetings and by conference call starting in 2005 and continuing into 2006 on September 8, October 3 & 25, November 8 & 16, January 5 & 26, April 6, June 15 & 29, July 14 & 31, August 10 & 25, and September 8. At its first meeting, the Board began drafting the rules necessary to implement a registration process for all private programs and began working on a survey to collect additional information necessary to examine the existing programs in Montana. The Board, with its Department of Labor staff, also held two Town Hall meetings, one in Trout Creek and one in Kalispell, to gather public comment, conducted 13 program site visits, collected and evaluated 17 program surveys, established a web site, and successfully registered 24 programs. The Board also created subcommittees to assist in developing an online survey and to examine existing standards and ethics regarding private programs.

An overview of the registration application is included in Table A; an overview of the Town Hall meetings is included in Table B; and an overview of all dates and locations of the Board's activities is included in Table C to this Report.

REGISTRATION OF ALTERNATIVE ADOLESCENT RESIDENTIAL AND OUTDOOR PROGRAMS IN MONTANA

Pursuant to its mandate to "develop and implement a process for registration of programs and to set fees to carry out its duties" the Board drafted and adopted rules, pursuant to the Montana Administrative Procedures Act. These rules are now promulgated at ARM 24.181.301 through 24.181.505. The Board adopted an application for registration, which

included the information as required by the statute, §37-48-103(3), and successfully registered 24 programs. The application form is available on the Board's website.

Pursuant to the statute, § 37-48-103(4), the Board has made the name, address, and contact information of each registered program available to the public.

FINDINGS REGARDING PAARP

A thorough understanding of the character and nature of private alternative adolescent residential and outdoor programs is necessary before any decisions can be made regarding effective public policy for these programs. Guided by the directives outlined in the statute and using the processes discussed above, the following information was gathered with regard to PAARP in Montana.

A. Description of the Programs and Facilities

Due to the variety of these programs a description of programs cannot be done succinctly. The availability of choice as to the type of program is wide. Some generalities can be formed, but for a more extensive review refer to Table A, which contains information from the registration applications. Because of the cumbersome nature of some of the research data some descriptors have been used, and the approximate meanings are as follows: "most" means 50% of the programs or more; "some" means below 50% and above 10%; and "few" means less than 10%.

The programs prescribe to a set **philosophy** such as, the Bible or Love and Logic, and/or they use a variety of models, such as Glaser's Choice Therapy, cognitive behavioral therapy and other models of behavioral therapy. When reviewing all the programs that registered, it is difficult to provide a simple definition to describe all the programs and the services they provide. However, there is a significant common point for all the programs as measured by the survey: parents participate in goal formation for their children. This marks a significant difference between some public services and private services. In PAARP registered programs, parents are actively engaged in their children's process and development.

Their **length of stay** averages 12 - 18 months. In some cases it is less than 12 months and in other cases it is more than 18. It can be as little as 3 to 6 months or as much as 24, but these are more the exception. Outdoor programs' attendance is measured in weeks. When asked for the average length of stay in the survey, the range was from 3 weeks to 2 years. In the survey the programs were asked if they have a specific expected length, or if they have a variable length of stay. Most all the programs stated that they have an open-ended program allowing a choice in the length.

The **typical day at a program** is structured starting with wake up procedures at a set time and then school time. There is scheduled time for meals, personal hygiene, chores, recreation, free time with supervision, and creative time. There is also scheduled time for individual therapy or mentoring and group sessions. Some programs provide extra

activities such as: earned privilege activities on and off campus, and family trips. There is a set time for lights out.

In the majority of programs the participants attend **school** on the program campuses. A few programs use the services of the local public schools. Some others use a mixture of on and off site campuses. For example when the students have reached a certain level of behavior and/or maturity, they may switch from an on-site campus to an off site campus, either public or private. The use of the Montana public school system is not a dominant feature. The exclusive use of public schools is being utilized by 3 out of the 24 programs that registered. (See Table A.) Most of the on-site schools are accredited or use accredited distance learning programs. (See Table A.) Most programs state that their teachers are certified to teach in the state of Montana. All of these programs stated that they work towards ensuring that credits earned in their program are transferred to other schools. The survey also indicates that each student has an educational plan. Most of these plans are developed under the direction of an academic director. At the time of registration, approximately 70% of the program participants attended schools accredited by Northwest Association of Accreditation of Schools and Colleges or were under the supervision of Montana licensed schools. There were 53 certified teachers, administrators, and guidance counselors working in these programs.

Some programs have physical education directors/teachers. The programs that participated in the survey listed a wide variety of activities from routine exercise and sports (basketball, volleyball, soccer) to activities unique to their location (camping, cross country skiing, ranching). Some programs also have art classes, horseback riding sessions and other specialty classes.

Of the sites visited over half referred to their meals as "home cooked" **meals**. Half of the visited programs shared that the participants help with food preparation. Some have their own gardens. A few programs shared various ways they ensure safe and well- balanced meals. Some responses were that they had a licensed nutritionist or meals designed by a state health department, planned rotation of menus, paid attention to different food needs, offered training for staff and students, and provided a self-serve breakfast with a specially planned nutritious snack. In the survey, the programs informally state that they are focused on serving nutritious well-balanced meals. Programs stated that they accommodate individual nutritional needs of participants such as vegetarian, allergies, etc.

Some of the programs have **animals** on the premises. These animals are mainly horses and dogs. Some programs have cattle and other animals including birds, cats, turtles, and rabbits. The number of animals is not large. The number of horses is varied, but the average was approximately 15. The site visits revealed that all the animals are well kept. Most of the programs that were surveyed responded that they use domesticated animals in their programs. Some of these animals are part of a working ranch/farm, and some are directly cared for by the participants.

Generally speaking most program campuses are located in rural areas. The majority of the programs are in western Montana. Youths are **housed** in dormitories ranging from 15 in a room to a series of smaller rooms with an average of 4 to a room. In smaller programs the participants are housed in larger homes and average 3 to 4 to a bedroom. Youth are not housed in single rooms. Bedrooms have spaces provided for their personal belongings. The bedrooms/dorms have adjoining or nearby bathrooms. The kitchens used in these programs range from industrial to family types. The kitchen style and size of the dining area depends on the size of the program. The programs provide physical recreation and fitness. Larger programs of 30 or more often have gyms and weight rooms. A few programs have indoor horse arenas.

B. Description of Populations

The majority of the youth are from out of state and between the ages of 12 to 17. The private programs serve approximately 1200 teens in the state. Some of the programs serve only girls or boys; others serve both. (See Table A.) A large number of the youth are from the Northwest and California. A few participants come from other countries. The great majority of the students are Anglo-Europeans of Christian faith, but there are youth from all minorities and religions. These teens generally suffer from behavior disorders. None of the programs are medical facilities and do not admit youth in need of long-term medical supervision.

C. Professional and Supervisory Employees

According to the survey results 15 programs indicated that they have licensed or certificated staff. The licenses and certification varies. They are: college degrees; medical licenses; licensed counselors; certified teachers, first responders, wilderness educators, and CPR/first aide trainers.

D. Average Daily Census

According to the registration application directions, the average daily census is derived by taking the # of service days (all of the adolescents on the days, multiplied by the number of days), totaling all for the days and dividing by 365. For example if a facility has 9 adolescents at it's facility on one day, then 10 on the next day that would be 19 total service days. The formula would actually determine the actual number of service days, 50 students on one day will be 50 service days. A service day is considered all or any portion of a twenty-four hour period in which service is provided to on participant.

The registration census reflects that the majority of the programs have 50 or fewer students. Thirteen programs have 0 to 10 participants. Seven programs have 11 to 50 participants. Three programs have 51 to 100 participants, and one program with over 100 adolescents. Of the 24 programs that completed the registration applications, 9 have 30 or more participants and serve 80% of the population.

E. Overview of Some Program Policies

1. Admission

One of cornerstone differences between public and private service is evident in admission policies of private programs. Private programs often serve a specific population rather than make attempts to serve every student with a behavioral issue. Programs are individually and uniquely designed to follow a particular system/philosophy. Parents decide to select an appropriate and individualized program for their child.

The programs' admission policies almost always state that they do not accept adolescents with serious developmental issues both physical and emotional. Most programs specifically outline the participants they can and cannot serve. Most programs feel they cannot serve participants with a history of fire starting or who have a significant history of violence. Some programs will not accept youths with eating disorders or a history of running away.

Programs employ appropriate procedures for new participants. Screening for appropriate placement may take place by phone. In some cases a clinician familiar with the child is consulted. Some utilize face-to-face interviews and/or a formal assessment tests. Of the programs surveyed, all required copies of the medical records, and most required records of immunizations and a medication inventory. Most require medical examinations and academic transcripts. Some require a psychological evaluation.

The admission policies vary largely according to the size of the program. Many programs accept participants after they have attended a wilderness or other residential program. Other programs accept youths directly from their parents' care. The majority of referrals are from educational consultants.

The PAARP survey indicates that following the acceptance of an adolescent in most programs, an emotional/psychological plan is developed with parental input by assigned staff members such as licensed professionals, the program director, and other specified staff. All the programs stated the plan is modified as needed, and most said they have policies regarding procedures for change. All but one of the programs stated they have a system to document and measure the progress of the participants.

The survey asked for reasons for discharge prior to completion of the program. There were many responses but the majority involved the following: safety risks to self or others such as running away; serious violence; self-harm or substance abuse in which there appears to be no decline; parents no longer feel they can afford the program; information held back during admission procedures; lack of participation by parents; or discovery that program is unable to effectively treat the youth. Some programs have a policy in place for adolescents who will not be returning home.

2. Behavior Management

Programs have policies for behavioral management. In describing the behavior management of programs it is difficult to completely generalize. The various philosophical beliefs that guide the programs also guide how the program is managed. There are many similarities in programs' general guidelines, yet there are differences in the details of how discipline procedures are constructed and utilized.

Most programs use levels and points that are connected to receiving and losing privileges. Many programs stated that they try to connect consequences to fit the situation. Programs specifically state their intention toward positive discipline. Most programs specifically state policies against corporal punishment, withholding anything essential for the quality of life, and verbal abuse or humiliation.

Behavior management techniques vary. Some of the faith-based programs use the Bible as a critical part of their behavior guidelines. Some programs utilize physical activity and writing projects, while others use a combination of both. Some programs use writing as a tool for reflection rather than a consequence. Some programs use community service as a consequence. The consequences vary widely. They range from writing a reflected essay on the choices made to extra chores such as weeding, filling potholes, and moving wood.

Personal belongings are generally limited to needed items. This allows enough space for everyone, and at the same time it allows for monitoring of items not allowed. Contraband can vary, but for all programs it involves drugs, alcohol, and cigarettes. It may also include certain types of music, clothing, sharp items, certain reading material and artwork, candy and soda pop. Some items are subject to pre-approval. The survey indicates that most all the programs have a dress code, and most programs do not require uniforms.

Participants are monitored by staff and in some programs mentored by other youth at a higher level. New students receive a higher level of supervision and monitoring. Larger programs with over 30 participants generally employ additional night staff and alarms.

3. Communication With Family Members

Communication with family members is an important component to all programs. Generally, the purpose is to increase positive communication between the participant and their families. All programs surveyed responded that they encourage communications with families. All programs encourage letter writing and most allow phone and face-to-face visits with family. Some outdoor programs, due to their short length of stay and remote placement, do not have specific policies except to state that parents would be notified in the event of an emergency.

According to the registration applications, all the programs encouraged letter writing from the beginning of the program. Some programs require participants to write. Most

monitor mail and packages for contraband or inappropriate information. Programs give examples of what is inappropriate including issues such as language or unauthorized information such as an address or letters from people not approved by parents. Parents are given information regarding the program's communication policy. Some of the programs ask the parents for the names of the other approved people who can communicate with their child. Although the participants most likely will not communicate with these people at first, as youths progress they may be allowed to write or speak to people on the approved list. When and how this occurs varies from program to program. This is in accordance with Regulation 612.2 of the US Postal Service's Postal Operations Manual, in which a minor's parents or guardian may control delivery of mail addressed to the minor child.

All the programs (other than a few outdoor programs) have policies for using the telephone. Due to management reasons, they are scheduled. Generally as the participants progress through the program they gain more telephone time with less supervision.

Visits are also included in the program policies. The plans vary but they all have an established time to begin, which is usually after three months. The first visits are on campus or limited off-campus day visits. As the participant progresses, the visits become overnight and longer time period. Most programs outline the rules for the participants to have home visits. Some programs also have parent-child workshops conducted by the staff.

4. Availability of Medical and Psychological Care

All programs that submitted applications have policies regarding medical care including both emotional and physical needs. Some programs have medical personnel and/or therapists on campus. The programs provide access to various medical services and mental clinics. Some programs have licensed nurses on their staff and doctors that come to their facilities. Some programs required staff to receive first aid and CPR training. Some programs use local services such as NA and AA groups.

Of the sites visited over half provide therapy for all participants. Some programs include the therapy in the cost of the tuition and others allow the parents to choose and pay separately for the service. Over half also provided group time with a therapist or a licensed counselor. A few programs that were visited had no therapist or licensed counselor.

Many programs have places for housing ill program participants. The organization of this arrangement varies largely depending on size and structure of the program. Of the programs visited, many discussed having policies and trained staff to deal with issues of **infection control**. Programs also referred to being directed by the health department and members of the medical field in regards to the management of infectious control (i.e. cases of the flu, pink eye, etc.)

5. Medication Management

Programs consider procedures for dispensing medication an important and serious responsibility. Many of the programs outline the procedures for dispensing medication and logging the activity, and they also have policies for securing medication. At least half of the programs visited had procedures that involved self-giving medication with strict supervision by trained staff.

6. Complaint or Grievance Procedures

The registration applications revealed that most programs have procedures for complaints and grievances by the adolescents and parents. It was evident that a process for grievances is a priority to the programs. Seventeen of the twenty-four programs that submitted applications articulated procedures to handle complaints. The programs stated that whenever possible, they encouraged their students to handle disputes directly with the individuals involved in the disagreement. However, when it becomes necessary to make a complaint to another person, the programs generally outlined a procedure that articulated a timetable with a range from 24 hours to 3 days for an initial response. The programs outlined steps that involved speaking to particular staff ranging from administration personnel, including the director(s), to therapists and counselors. The next step (For a few programs this is the first step.) the programs outlined a process to submit a complaint in writing. Five programs submitted a form used for this purpose. The complaint is reviewed by a director, a committee, or a board. Many programs articulated that an investigation is done in response to a complaint. The programs also stated that the goal was to work to mediation of the situation. Depending on the situation, the complaint may include parental involvement. Some programs assign staff to serve as an advocate for the student, if this is deemed necessary. Some of the programs included in their policies the requirement to report any complaint of abuse to child protective services in Montana.

G. Program Staff

The number of employees working in the programs according to the survey results varies depending on the size of the program. The very wide range goes from 3 employees to 250. Of the programs surveyed 9 have 10 or less employees, 7 have with between 16 and 74 employees, and 1 program has 250. The ratio of staff to student also varies with size. There are many configurations listed in the survey. The range is from 8 staff to 1 participant to 1 awake-staff at night to 35 youths. The 8 to 1 is unique. Generally the range is 1 staff to between 2 and 4 participants. Most of the programs reported that they require employees to have at least a high school diploma. All but one program requires criminal background checks. Most programs require personal and professional references, driving records, and first aid/CPR certification. Some programs require fingerprinting.

F. Business Entity

Program ownership ranges from corporate to partnership or sole proprietorship. All of the programs that participated in the survey have never had certification or licensure revoked in any state. Two programs have voluntarily surrendered licenses stating their reason for surrendering as a choice not to have a business in another state or wanting to become a private organization. The amount of time programs have been in business varies from 1 to 16 years with most operating between 5 and 10 years. Of all the registrations collected, only three are outdoor programs, and the rest are residential.

I. Programs' Membership in Related Associations

Most of the private alternative adolescent residential and outdoor programs in Montana belong to national or state associations, through which they gain access to information and contact with other programs relevant to their particular type of services. The purposes of these associations are varied. They range from National Association of Christian Social Workers to Outdoor Behavioral Health Care. (For a complete list see Table A.) The varied associations reflect the many different types of programs and their approaches. The associations in Montana that indirectly serve the greatest number of participants are the Montana Alternative Adolescent Private Programs (MAAPP), National Association of Therapeutic Schools and Programs (NATSAP), and the accrediting agency Northwest Association of Schools and Colleges.

IMPACT ON LOCAL COMMUNITIES

In addition to collecting data through site visits and written information from the programs, an effort was made to determine what impact the programs have on local communities. The PAARP board held two town meetings so that members of the public could feel free to share any viewpoints relative to these programs. They were well attended and testimony was taken. They occurred on March 20, 2006 in Trout Creek and July 20, 2006 in Kalispell. (See Table B for the Town Meeting Summary.)

1. Community Service

During the site visits the programs were questioned about the relationships they have with their communities. Generally the programs reported favorable rapport with their local communities. Many of the visited programs referred to projects within the community in which their participants provide community service. For some programs this community service is a regular part of their program. For other programs it was more occasional. At both town meetings, members of the public referred positively to the work the programs do not only for the students, but also for the community at large. The results of the survey indicate many programs participate in local, state, federal and/or tribal community related service projects. These range from established forest projects to serving a variety of local community needs. A number of programs had favorable

newspaper articles to share. Some programs have had negative press as well, but this is in the minority.

2. Financial Impact

The programs' benefits to the community are not only from student service, but there is a huge financial impact both locally and statewide. The programs provide jobs and income to many Montana residents. These jobs generate taxes from the industry in the form of income, business, and real estate taxes. There are many businesses that are sustained from the industry as well. These businesses depend on the employees of the programs as well as the families that come to visit their children. Any costs to the community are minimal. The families pay medical services or any other expenses the program participants may incur.

Some of the programs that participated in the survey also reported their total payroll per year. Because of the many different sizes of the programs the payrolls have a wide range, from \$20,500 to \$6,000,000+ per year. Of the 15 programs that responded 4 programs stated their payroll was under \$100,000. A total of 4 programs were between \$100,000 and \$200,000 and 3 programs stated they were between \$500,000 and \$600,000+. The remaining four programs had a payroll between \$1,800,000 and \$6,000,000+.

The impact on local communities can be calculated in three different areas with conservatively estimated beginning data. If the local community is defined as the local trade area, a multiplier of two can be applied in each instance since it is estimated that each dollar has an impact double its value in the local trade area. After conferring with three different economists who concluded that the multiplier would be between two and four, two was used to provide a conservative estimate.

A. Payroll: From the fifteen responses received from the survey, the total annual payroll was \$13,732,344.00. This would account for about seventy percent of the students enrolled in the programs. It is estimated based on this percentage that the payroll of the programs not responding would be \$4,119,032.00 for a total payroll of around \$17,850,000.00. When that figure is multiplied times two, the impact from payroll is \$35,700,000.00.

B. Parent visitation: Parents visit their student in the program on an estimated basis of 2.5 times per year and are in the state on average of about 3.5 days per visit. Each set of relatives visiting would possibly include a brother, sister, or grandparent; almost everyone would fly into the state. It is estimated that a traveling unit of 2.3 people who fly into the state spend \$145.68 per day while in the state. There are approximately 1161 students in the programs that have registered and an estimated forty students in those programs that have not registered. Using these numbers it can be estimated that yearly there would be 3002.5 total visits made in Montana, and the families would spend a total of 10,508.75 days in the state. The total estimated expenditure would be \$1,530,914.47 for travel by families in Montana per year visiting teens in the program. Taking the multiplier of two to determine impacts in the state, the total would be \$3,061,828.80.

C. The largest program in the state was able to calculate that they spent approximately \$234.00 per student for the month of July in the local trade area. This included groceries, hardware purchases and other supplies needed for running the program. The program expenditures were lower than they are for other months. It is assumed that other programs might not on average spend more than this amount, although they occasionally might spend more than that this stated amount. This figure appears to be a very conservative figure. Multiplying the amount the program spent per student (\$234) times the number of students in programs, which is estimated to be 1,201, the total spent per student in the local trade area would be \$281,034.00 for July. The total for the year would be \$3,372,408.00. Using the suggested multiplier of two, the total impact of expenditures made on students in the local trade area would be \$6,744,816.00.

There are other impacts such as property taxes, corporate income taxes of those programs incorporated, program income taxes, and individual income taxes. These impacts cannot be calculated at this time since the board did not have sufficient time to obtain the needed figures, and in some cases, such as employee income taxes, would only be able to estimate. It can be assumed that the income taxes of employees of the programs would be above average since the salaries of the employees are in most instances significantly higher than the average wage earner in Montana.

3. Impact on Local Schools

Another way that communities have a partnership with programs is through their communities' schools. Some programs have partnered with the schools to be involved with limited special activities or classes. Only four programs use the public school system exclusively (generally smaller programs), and they do have an excellent relationship with the schools. Two of the school districts that have students in their high schools commented at the town hall meetings. In both occasions they spoke favorably about the students and their contribution to the school's climate and culture. They spoke about how the program participants brought some diversity to their campuses. They also spoke about the contributions the students from programs have brought to their athletic and other special activities. The students bring dollars to the district. The number of special needs students is limited due to admission policies. Programs do not have students attending a school outside the program until they have progressed to a certain level. Money provided for the students by the state is far outweighed by the revenues the families provide into the state (generated by tuition and visits). Refer to Table A for the exact number of programs that attend schools outside of their facility. It is very limited.

4. Other Incidents

There have been a few incidents reported when participants ran away from the programs. Generally, most people in the community are supportive of this situation. The comments at the town hall meetings reflected that the negative incidents and people who distrust programs because of negative incidents are greatly outnumbered by those who speak

favorably about adolescents and programs. The positive occurrences far outweigh the negative ones.

ASPECTS THAT NEED IMPROVEMENT

The following recommendations are based on the information obtained from: the registration form; the voluntary survey, program visits; town hall meetings; program policies; and information supplied by Department of Labor and Industry (DLI).

It is recommended that:

1. Each program have clear, written policies that are made available to the board, the DLI, personnel within each program, and parents of participants in the program. It was observed that some programs need to clarify their policies, and all programs could benefit from the process of continual review. This should be accomplished through education and networking among programs.
2. Five of the programs are not registered, and the Board needs the authority to compel registration.
3. Site visits and other input indicated that in a limited number of instances, improvements could be made to a program. None of the observations or data collected identified problems that were systemic.
4. The Board had less than a year to comply with the legislation (September 2005 to present). The Board accomplished a great deal in such a limited time but additional work needs to be done such as identifying unregistered programs. Additional time is needed to thoroughly analyze the information gathered in relation to safeguarding the public good.
5. The Board needs more time to continue the work outlined in HB 628 regarding examining current regulation and standards already in place in the state of Montana.

Standards and Ethics Committee Report

Montana Board of Professional Alternative Adolescent Residential or Outdoor Programs

The Standards and Ethics committee was charged with responding to two questions:
The

- What ethics and standards are commonly used by professional organizations and certifying agencies to assess the quality of residential programs for children and adolescents?
- What ethics and standards do Montana programs claim to follow?

Ethics and standards provide guidance regarding moral behavior and quality. Ethics are a set of principles regarding right and wrong behavior while standards are criteria for determining how things should be done. Standards of practice are a means of measuring the quality of a program or intervention.

To answer the first question, standards and ethical guidelines were examined from a thorough review of all standards from 3 professional organizations and 4 state licensing agencies (NATSAP- National Association of Therapeutic Schools and Programs, MAAPP-Montana Alternative Adolescent Programs Association, JCIS- Joint Council on International Children's Services, Utah, Oregon, Wyoming, and Montana – Group Home regulations). This review also included an overview of JACHO (Joint Commission on Health Organization).

This review found that all of the professional organizations have both ethics and standards within their guidelines and operating principles. The ethics for NATSAP and MAAPP are included in this document along with a review of the following 11 standards that are present in all the organizations and state licensing requirements. Within this document is a comparison of these standards and the areas of commonality between all of the organizations and states that were reviewed.

- Administration
- Legal (i.e. compliance with relevant statutes)
- Personnel
- Participant Rights
- Admission/Discharge Policies
- Safety
- Physical Environment
- Medical Care
- Education
- Food
- Programming and Discipline or Behavior Management

The MAAPP ethical principles and practice standards were developed through a process of Montana programs coming together to discuss, review, and refine ethical principles and practice standards for the diverse set of programs that exist in Montana. Through a series of six meetings involving as many as 20 different program owners and operators a consensus was forged on a set of ethical principles and practice standards believed to ensure safe, responsible program operation in this state. These principles and practice standards have been accepted and ratified by the membership of MAAPP and represent the standards under which a majority of programs are willing to operate.

The standards that were agreed upon by MAAPP are based upon those adopted by NATSAP. The NATSAP standards themselves were the product of extensive input from more than thirty programs located throughout the country and research of standards used in Utah, Arizona, Oregon, Alabama, Georgia, and several other states, as well as consultation with child advocacy groups, and private school accrediting bodies such Pacific Northwest Association of Independent Schools, Northwest Association of Schools, the North Central Association of Schools and Colleges, the Southeastern Association of Schools, and the state of New York's standards for private school operation.

An important aspect of the MAAPP practice standards and ethical principles is that in Montana the programs themselves have come forward with appropriate standards and are willing to be held accountable to these standards. Such a willingness to advocate for quality standards of practice can result in a quality awareness and improvement attitude among program operators that will have strong results in achieving safe, high quality care in Montana programs.

This committee also has included a comparison of the policies and procedures submitted by the programs in Montana who have registered with the Private Alternative Adolescent Residential and Outdoor Programs Board.

Conclusions from this comparison have indicated several important facts:

- Programs in Montana have many policies in place that are in alignment with regulations from other states.¹
- Programs in some policies go beyond what state regulations directly articulate, indicating that private programs have a strong and holistic sense of what is needed for their industry.²
- Programs have many common points in their current operating policies. It appears that programs are capable of creating a structure of guidelines to insure the public good and safe services for children and youth.³

¹ p.35-36 medicine management/care, p.41: positive discipline

² p.12-13: nutrition, p.15: access to health care, p.22: environmental requirements, p.35-36: medical care/needs, p.38: handling/dispersement of medication, p.39-40: grievance procedures

³ p.15: access to health care, p.21: employee practices, p.27: child discipline, p.34: admissions criteria, p.37: securing medication, p.39 grievance procedures

Montana Board of Private Alternative Adolescent Residential and Outdoor Programs Ethics and Standards Report

1. Administrative

COMMON AREAS OF AGREEMENT

- All programs require you to disclose your legal status. Who governs the program and the lines of authority. Board, private owner or whatever the case may be. They clearly want to know who is responsible for the program.
- In almost all cases a description of the following basic principles: Policies on admission, discharge, financial management
- Full disclosure of fees, refunds
- Minimal Training, mission statement, history of program, grievance policy, liability insurance, abide by ethical standards

STANDARDS COMPARISONS

NATSAP

Standards categorized as “ADMINISTRATIVE PRACTICES AND PROCEDURES 2.0-2.4.6”

- The program/school has a responsibility and duty to strive to provide its program participants with appropriate ethical and professional service in all areas of operations.
- The program/school will have a written plan for governance, program administration, and professional services. The Plan includes the following elements.
 - Introduction and history of the program/school.
 - A delineation of the responsibility of the governing body including, policy development, responsibility for implementation, compliance, amendment, and oversight of the policies.
 - Mission Statement.
 - Philosophy of the program/school.
 - Description of the population the program/school serves, including admission, non-admission and discharge criteria.
 - Description of services provided.
 - Organizational Structure including an organizational chart.
 - Tuition / Fee statement including all ancillary cost, and refund policy.
 - A plan for self-evaluation and program/school improvement.
- The program/school shall have proof of general liability, professional liability, fire, and vehicle insurance coverage as appropriate.
- The program/school will follow accepted accounting practices.
- Member schools/programs will:
 - Not offer or accept payment for referrals.

- Represent facts truthfully to program participants and third-party payers.
- Disclose fully all costs and fees for service.
- Respect copyrights, trade authorship, and proprietary information, and will not plagiarize or use materials, documents, or resources from other sources or programs without permission.
- Not use a name or marketing strategy that misleads the public or makes guarantees of outcome to consumers.
- Disclose fully all ownership and financial relationships between associated programs, services, and professionals where there is a potential for a conflict of interest.

MAAPP

Standards categorized as “ADMINISTRATIVE PRACTICES AND PROCEDURES 2.0-2.4.6”

- The program has a responsibility and duty to strive to provide its program participants with appropriate ethical and professional service in all areas of operation.
- The program will have a written plan for governance, program administration, and professional services. The plan includes the following elements.
 - Introduction and history of the program
 - A delineation of the responsibility of the owner or governing body including, policy development, responsibility for implementation, compliance amendment, and oversight of the policies.
 - Mission Statement
 - Philosophy of the program.
 - Description of the population the program serves, including admission, non-admission, and discharge criteria.
 - Description of services provided.
 - Explanation of Organization Structure including and organization chart if applicable.
 - Tuition/fee statements including all ancillary cost, and refund policy.
 - A plan for self-evaluation and program improvement
- The program shall have proof of general liability, professional liability, fire and vehicle insurance coverage as appropriate.
- The program will follow accepted accounting practices.
- Programs Will:
 - Represent facts truthfully to program participant and third-party payers.
 - Disclose fully all costs and fees for service
 - Not use a name or marketing strategy that misleads the public or makes guarantees of outcome to consumers
 - Disclose fully all ownership and financial relationships between associated programs, services, and professionals where there is a potential for a conflict of interest.

- Disclose fully to the board in the application process any past sanctions, licensure/accreditation revocation, and criminal conviction against any program, program owner, and board of directors or executive officer.

JCICS (Joint Council on International Children's Services) www.jcics.org

Standards categorized as "PROFESSIONAL CONDUCT"

- Member agencies will:
 - Be knowledgeable of and adhere to relevant laws and regulations and policies pertaining to adoption-related services provided by the member agency.
 - Refrain from posting photos of children on web sites if prohibited by the sending country. Children shall be placed on hold only for families who have a valid Home Study. All efforts shall be made to protect the privacy of listed children.
 - Develop written policies and procedures that recognize and respect the rights of families and children, such as response times, support, methods of communication, and payment practices.
 - Encourage the continuing education and professional development of agency staff that shall include training in ethics.
 - Encourage staff participation and leadership in professional organizations.
 - Provide a written grievance policy to clients and staff.
 - Maintain records that include case notes, written information given to families about the agency policies, procedures, fees, and current projected costs, as well as characteristics of children eligible for placement.
 - Communicate and attempt to resolve professional conduct or practice matters in writing with other agencies or individuals. Should such issues not be resolved in this way, member agencies use the JCICS Grievance and Disciplinary Policy.
 - Treat all case records as confidential material. Release of such information shall be done only with informed written consent of the person whose information will be released (or the parent or legal guardian of such a person who is unable to provide informed consent").

Standards categorized as "FINANCIAL"

- Member Agencies Will:
 - Provide to all applicants, prior to the acceptance of any fees, 1) a written schedule of current estimated fees and expenses, 2) a statement on when and how the fees and expenses must be paid, and 3) an explanation of the circumstances under which fees or expenses may be charged, increased, waived, reduced, or refunded. In addition it shall include a statement when and how fees and expenses must be paid. Agencies may also wish to include a statement on the costs beyond their

control, including but not limited to immigration fees, travel expenses, and legal fees for adoption or re-adoption in the US.

- Prohibit the use of payments or other material transactions meant to
 - induce or encourage any parent or relative to place a child for adoption,
 - induce or encourage any person or entity with jurisdiction over the child to release a child for adoption, or
 - influence a decision to place any child with a particular person or entity over another entity.
- Prohibit payments to any international staff or facilitators solely on a contingency basis (such as a minimum number of placements by facilitators) in an effort to curb financial incentive or profiteering as motivation for adoptive placements. Payment for child placement services shall be based on fee for service model based on the average estimated amount of time, and other costs related to that placement and/or other related child welfare services.
- Provide an Annual Report or most recent form 990 or 990 EZ to clients upon request.
- Acquire professional liability insurance and/or establish an arbitration or mediation process.

MONTANA

Standards categories under “YOUTH GROUP HOMES” as “YOUTH GROUP HOME: ADMINISTRATION ARM 37.97.501 (1-4)”

- The youth group home
 - shall be a nonprofit or for profit corporation registered under the laws of Montana or
 - under direct administration of a unit of state, local or tribal government.
- The provider shall have established sound plans and policies of organization and administration clearly defining legal responsibility, administrative authority and responsibility for services to the residents and community.
- The provider shall have written policies for personnel, admission, discharge, program and financial records. These policies shall be furnished to the department with the initial license application and annually thereafter.
- Staff of the youth group home shall receive training from the provider on the provider's policies and current status of residents.

UTAH

Standards categorized under “RESIDENTIAL CERTIFICATE CHILD CARE STANDARDS” as “OWNER QUALIFICATIONS R430-50-5 (1-3)”

- To be eligible for an initial residential certificate the owner must:
 - be at least 18 years of age;
 - have a current course completion in basic first-aid and Cardiac Pulmonary Resuscitation (CPR). First-aid and CPR certification refers to courses given by the American Red Cross, the Utah Emergency Medical Training Council, or other courses that the licensee can demonstrate to the Department to be equivalent; and
 - meet at least one of the following:
 - have a high school diploma or G.E.D.;
 - be an approved federal food program provider as of July 1, 1998; or
 - if (i) or (ii) cannot reasonably be met by the owner and an undue hardship is created, the owner may request a variance from the Department.
- The owner shall complete a minimum of five hours of Department approved training within 90 days of initial certificate issuance. Documentation of training shall be maintained at the home of the owner. Training will be Department-approved if it includes:
 - reporting requirements for witnessing or suspicion of abuse, neglect and exploitation;
 - proper hand washing and sanitation techniques;
 - recognizing early signs of illness and determining if there is a need to exclude a sick child from the home;
 - accident prevention and safety principles;
 - positive guidance for the management of children;
 - child development;
 - age appropriate activities for children; and
 - If child care is provided to children under the age of two, the training must also include:
 - Preventing Shaken Baby Syndrome;
 - Coping with crying babies; and
 - Preventing Sudden Infant Death Syndrome.
- The owner shall ensure that each care giver who has direct contact with or access to children successfully completes the required five hours of department approved training before starting assigned duties.

WYOMING

Standards categorized as "ADMINISTRATION AND GOVERNANANCE"

- Each agency shall be incorporated and shall submit to the certifying authority its Articles of Incorporation and Certificate of Incorporation
- The agency shall have a governing body which exercises authority over and has responsibility for the operation, policy and practices of the agency
- The governing body shall be:
 - A board of directors in the case of a non-profit organization;
 - A board of directors in individual owners of a for profit organization

- The agency shall maintain a list of members of the governing body. This list shall indicate the name, address, and term of membership of each member and shall identify each officer and the term of that office.

1. Admission And Discharge Policies

COMMON AREAS OF AGREEMENT

- Written policy for admission and discharge.
- File for each client.
- What clients are not acceptable for the program.
- How you would discharge a client.

STANDARDS COMPARISONS

NATSAP

Standards categorized as “ADMISSION/DISCHARGE POLICY 4.0-4.5”

- The program/school will have a written Admission Policy, which defines the enrollment criteria and delineates inclusion and exclusion criteria. Such criteria will be consistent with the mission of the program/school. Admission forms will provide pertinent history including family, medical, psychiatric, developmental, and educational background information.
- The Admissions screening process will examine the physical, emotional, behavioral, and academic history, in order to determine whether the program is appropriate in light of the prospective participant’s needs and limitations
- The program/school will provide program participants, parents, legal guardians, or other pertinent parties with a clear and informed statement of the nature of the services that will be provided including, risks associated with these services.
- Upon admission, a file will be created for each program participant, containing the following:
 - Demographic information including emergency contact information.
 - Basic medical, family, behavioral, legal, educational, information including past and current assessments.
 - A signed statement indicating receipt of a copy of the student handbook or statement of Participants Rights and Responsibilities, or a witness attesting to the participant’s refusal to sign.
 - Contract, release and consent forms.
 - Documentation of communication with parents, legal guardians, payer sources and other parties.
 - Photograph.
 - Copy of any grievance filings and action taken.

- Documentation of services rendered.
- Discharge summary and academic transcripts
- The program/school will conduct on going assessment to determine appropriateness of continued placement.
- Upon termination or discharge of a program participant, the program/school will make appropriate recommendations for continuing care and/or education.

MAAPP

Standards categorized as “ADMISSION/DISCHARGE POLICY 4.0-4.5”

- Written policy for admission, criteria, family history
- File for each participant
- Signed statement indicated receipt of a copy of statement of Participants rights and responsibilities.
- Consent forms, contract
- Documentation of communication with parents, legal guardians, payer sources and other parties.
- Photograph
- Copy of any grievance filings.
- Documentation of services rendered, treatment plans, academic discharge summary
- On going assessment of appropriateness of placement
- May make recommendations for continuing care and or education if you have a policy.

JCICS

Not mentioned

MONTANA

- Criteria for admission and discharge

WYOMING

- Written policy defining the children that will be admitted to the facility. Written policy defining the children or behaviors that are not appropriate for admission.

UTAH

Not mentioned

3. Education

COMMON AREAS OF AGREEMENT

- Follow State and local laws.
- Meet child's educational needs.

STANDARDS COMPARISONS

NATSAP

Standards categorized as "EDUCATIONAL SERVICES 11.0-11.3"

- Educational services will be consistent with the mission of the program/school and may include: fully developed college preparatory academic programs leading to a diploma, individual courses offered for credit, services such as academic packets or online courses offered for credit through materials developed or administered by third party providers, and academic support and skills development offered for no credit. Some programs may choose to outsource academic services to private contractors or public school districts.

The scope, extent, and instructional methodology of the educational services including, whether the services are provided in house or out sourced, will be fully disclosed by NATSAP members to any interested party, program participants, families, referring professionals, and school, college and university admission's offices. All programs/schools that offer academic credit to program participants, as a part of their in house services shall:

- Maintain an academic transcript for each program participant in his or her permanent file that is current and up-to-date.
 - Required information at a minimum includes:
 - Program/school name, address, phone number, and date prepared
 - Student name, address, and DOB
 - Admission date, emission date,
 - Grading scale
 - List of individual classes, with grades and credit earned, and GPA
 - Program/schools that grant diplomas and advertise as a school, or as providing academic or educational services comparable to a school will include the additional information on the transcript:
 - If applicable, diploma earned and graduation date.
 - Accrediting body and the program/school's accreditation status
 - Program/schools that provide academic or educational services may include the following additional information on the transcript:
 - Standardized test scores (PSAT, SAT, ACT, ITBS, etc.)
 - Immunization records

- Class rank
- Provide a written description of educational services that includes:
 - A profile of educational services with descriptions of:
 - Ages and grades taught
 - Educational philosophy
 - Graduation requirements leading to a diploma
 - Policy delineating how credit is earned and assigned
 - School calendar
 - Policy describing curriculum oversight and quality assurance
 - Official school contact for questions about the educational program
 - A curriculum catalog with:
 - Course descriptions
 - Scope and sequence
 - Goals and objectives
 - Method of instruction
 - Evaluation and assessment
 - A student profile
 - Teacher qualifications including education, experience, and/or certification.
- Any diploma granting program/school that represents itself as a school will abide by the NATSAP Supplemental Standards for Therapeutic Boarding Schools

MAAPP

- Applicable State laws.
- Suited to child's needs.

JCICS

None mentioned.

MONTANA

Standards categorized asApplicable laws

- Education: Each provider shall assure that each child in its care is offered an educational program that is appropriate to the child's needs and in compliance with compulsory school attendance laws.

UTAH

Applicable Laws

WYOMING

- No mentioned but mentioned elsewhere that a child will have appropriate education and local and State laws will be adhered to.

4. Food

COMMON AREAS OF AGREEMENT

- Nutritionally adequate diet in accordance with child's needs.
- Basic food groups
- Regular meals.
- Sanitary handling of food.

STANDARDS COMPARISONS

NATSAP

Children have a balanced diet according to age and activity.

MAAPP

Children have a balanced diet according to age and activity.

JCICS

None mentioned.

MONTANA

Standards categorized as “....

- Nutrition:
 - The provider shall serve meals and snacks appropriate to the nutritional needs of the children and shall include the four basic food group requirements.
 - Special diets shall be provided for residents as ordered in writing by a physician. Such orders shall be kept on file at the facility.
 - Copies of menus as served shall be kept on file for one month and shall be available for inspection.

- All food shall be transported, stored, covered, prepared and served in a sanitary manner.
- Use of home canned products, other than jams, jellies and fruits is prohibited unless the youth group home has been commercially approved.
- Hands shall be washed with warm water and soap before handling of food.

UTAH

Standards categorized as "FOOD SERVICE R430-50-12"

- A meal or snack shall be served to the children at least every three hours. Infants shall be fed on demand or according to parent directions.
- The food preparation area shall be clean and sanitary.
- All care givers who prepare or serve food and snacks must have a current food handler's permit.

WYOMING

- Food shall be of a sound condition, free from spoilage, filthy or other contamination and safe for human consumption.
- Food must come from sources that comply with all laws relating to food and food labeling.
- Implies in other areas that nutritionally adequate meals should be served.

5. Legal

COMMON AREAS OF AGREEMENT

- All organizations require you to adhere to local, State and Federal Statutes.

STANDARDS COMPARISONS

NATSAP

- Adhere to all State and Federal Laws

MAAPP

- Adhere to all State and Federal Laws

JCICS

- Adhere to State and Federal Laws

MONTANA

- Comply with all local and state laws and ordinances

UTAH

- Comply with all local and state laws.

WYOMING

- Adhere to all state and federal laws

6. Medical Care

COMMON AREAS OF AGREEMENT

- Written policy
 - Access to appropriate medical care as the need dictates
 - How medication is handled, dispensed and stored.

STANDARDS COMPARISONS

NATSAP

Standards categorized as “HEALTH CARE ACCESS 7.0-7.1.3”

- The program/school will have a policy on health care that addresses the following issues:
 - Access to appropriate medical care.
 - Delineation of whom is authorized to dispense medications.
 - A policy on storing, accounting, and security of medication.

MAAPP

- The program will have a policy on health care that addresses the following issues:
 - Access to appropriate medical care
 - Participant access to first aid and CPR
 - Description of the protocols, process and roles of individuals that are involved in the administration of medication.

- Medication security, storage, administration, dispensation, storing, accounting and the disposal of out dated or discarded medications.

JCICS

None mentioned.

MONTANA

Standards categorized as "YOUTH GROUP HOME: PHYSICAL CARE 37.97.506 (1-6)

- Every youth group home shall have access to the services of at least one physician.
- Medical, dental, psychiatric, psychological care and counseling services shall be obtained for children as needed.
- If a child has not received a complete physical examination within 6 months prior to placement, the provider shall arrange for the child to have a complete physical examination within 30 days after admission to the facility and yearly thereafter.
- If a child has not had a dental examination within a year prior to placement the provider shall arrange for the child to have one within 90 days after admission. All necessary dental work shall be done and reexamination shall be arranged for the child at least annually.
- Provisions for treatment of diseases, remedial defects or deformities, and malnutrition shall be made by the provider immediately upon the physician's recommendation with notification to the placing agency.
- All medication shall be kept in a place inaccessible to children, in their original containers, labeled with the original prescription label.

UTAH

Standards categorized as "CHILD HEALTH AND MEDICATIONS

- The owner shall inform the parents or guardians of all injuries and incidents that occur during the child's stay at the home.
 - The owner shall immediately notify the parents or guardians if medical treatment is required.
 - For any emergency that requires a response by emergency medical treatment providers, fatality, or hospitalization of a child in care, the owner shall:
 - notify the Department within 24 hours of occurrence, either by phone or facsimile; and
 - submit to the Department within five business days of occurrence a written injury and accident report.
- If an owner chooses to administer medications, then the oral over-the counter and all prescription medications must be in the original or pharmacy container, have the original

label, include the child's name, have child proof caps, and have written instructions for administration.

- The parent or guardian shall provide written permission for the administration of all medications.
- The owner shall report any adverse reaction to a medication or error in administration to the parent or legal guardian immediately upon recognizing the error or reaction.
- The owner shall ensure that all medications are secured from access to children. If medications are required to be refrigerated, then they shall be stored in spill-proof packaging.
- The owner will return all unused and out-of-date medications to the parent or guardian.
- The owner may not admit or provide care to a child without proof of current immunizations, or evidence of conditional enrollment, or evidence of a personal, medical or religious exemption. Conditional enrollment means that the child has received at least one dose of each required vaccine prior to enrollment and be on a schedule for subsequent immunizations.
- The owner shall inform parents of communicable illnesses or parasites on the day of discovery.
- The owner shall ensure that the use and accessibility to illegal substances or sexually explicit materials are prohibited by any person anywhere on the premises during the hours of operation when children are in care.

WYOMING

- Reference is made to adequate access to medical care and a physician.

7. Participants Rights

COMMON AREAS OF AGREEMENT

- Written statement about rights and responsibilities.
- Follow all applicable laws.
- Protect fundamental human civil, constitutional and statutory rights.
- Respect human dignity.
- Grievance procedures.
- Privacy of information.

STANDARDS COMPARISONS

NATSAP

Standards categorized as “PARTICIPANTS RIGHTS AND RESPONSIBILITIES 6.0-6.1.10”

- The program will have a written Student Handbook or statement of Program Participant Rights and Responsibilities as appropriate to the setting, purpose, pertinent state and federal law. Such manual or statement will include statements regarding the following rights.
 - To receive care or services within the program's capability, mission, and applicable law and regulations.
 - Freedom from discrimination.
 - The expectation of a safe environment with respect of human dignity.
 - Respect for privacy of information and records of each individual and family served.
 - A description of any restrictions in communication or visitation.
 - A description of privileges and limitations for participants.
 - A description of access to religious services and practices.
 - A statement indicating that the program retains the right to maintain a contraband free environment and will make known any search or testing procedures used in this effort.
 - Procedures for students/participant grievance and complaint will be clearly outlined along with a statement guaranteeing freedoms from retaliation for making complaints.
 - A diet that is nutritionally sufficient for age and activity level.

MAAPP

- Written statement about client rights
- To receive care or services within the program's capability, mission and applicable law and regulations
- The expectation of a safe environment with respect of human dignity
- Respect for privacy of information and records of each individual and family serviced
- Policy governing expression of religion
- Grievance procedures
- Diet sufficient for age and activity. Nutritionally sound.

JCICS

Does not specifically address rights

MONTANA

Does not specifically address rights

UTAH

Does not specifically address rights

WYOMING

- Protects the fundamental human, civil, constitutional, and statutory rights of all children and families.
- Equal access to services regardless of race, religion, ethnicity, sexual orientation, disability or gender
- Access to educational services
- Dignity of every child and family is recognized and respected in the delivery of services.
- Every child and family receives services according to individual need
- Services are provided within the most appropriate setting.
- Grievance procedures

8. Personnel

COMMON AREAS OF AGREEMENT

- Personnel file.
- Written personnel policies and procedures.
- Criminal background checks.
- Mandatory reporter, screening, training, minimum requirements.
- Orientation, continuing education.
- Lines of authority.
- Medical statement or exam.
- Application.
- Driver's license and driving record if you will drive.
- Job Description.

STANDARDS COMPARISONS

NATSAP

Standards categorized as "EMPLOYEE PRACTICES 3.0-3.3.1.12"

- The program/school will only provide services (including assessment services) that lie within the scope of the service, training and qualifications of its staff. The program/school will accurately and factually represent the competence, education, training, certification and experience of its employees. NATSAP members will not discriminate on the basis of race, religion, gender, or sexual orientation.
- Hiring Practices

- Applicants are required to complete an Application for Employment. The application form must include the following.
 - Previous place(s) of employment.
 - Signature, verifying that all information is correct and factual.
- Upon extending an offer for employment, the program/school will obtain:
 - A criminal background check including driving history.
 - A minimum of two professional references (written or verbal).
 - Proof of professional credentials.
 - A medical examination or statement signed by the employee assuring fitness to execute the physical and mental requirements delineated in the job description.
 - If the employee is required to drive a company vehicle, or is asked to transport program participants in his/her own car, the Department of Motor Vehicle will be contacted to determine that the respective employee has a valid driver license.
- On-Going Employee Practices
 - Each employee will have a written job description. The job description will include the following:
 - Job title.
 - Duties and responsibilities.
 - Minimum level of education, training and work experience required for the position.
 - Physical demands of the position.
 - Lines of authority. (Delineation of supervisory responsibility)
 - The program/school shall have written Employee Policies and Procedures that will include policies on:
 - New Employee orientation procedures including:
 - Orientation in philosophy, objectives and services.
 - Emergency procedures. (Fire, Disaster, etc.).
 - Current program/school policy and procedures including behavior management.
 - First aid and CPR training.
 - Statutory responsibilities, including those covered by state and federal laws.
 - Continuing staff training and development.
 - Performance appraisals.
 - Methods for filing and addressing employee grievances.
 - Disciplinary actions, termination, and discharge practices.
 - Sexual and other forms of harassment or misconduct.
 - Abuse reporting laws
 - Vacations, holidays, illness, extended leave, military leave, and jury duty.
 - Volunteers, interns, and contract personnel if applicable.
 - Confidentiality and information disclosure within the limits recognized by appropriate professional standards, including state and federal regulation.
 - Transporting program participants and their parents/guardians.

- Prevention and investigation of allegations levied by program participants regarding employee misconduct.
- Personnel File
 - The program/school will maintain a personnel file on each employee that includes:
 - Application and/or resume
 - Background clearance.
 - Proof of credentials including education, licensure, certifications, etc. as applicable.
 - Proof of medical examination or statement of ability to perform duties.
 - Signed job description.
 - Documentation of new employee orientation and ongoing staff development training.
 - Performance evaluation(s).
 - Emergency contact information.
 - Documentation of disciplinary actions, termination or discharge.
 - Signed confidentiality agreement regarding the exchange of information concerning program participants, their families, and fellow workers.
 - Copy of driver's license (if employee is required to drive a company vehicle as part of the job).
 - Documentation of employment status e.g., hourly, salary, part-time, full time, exempt, non-exempt, etc.

MAAPP

- Application for employment
- Criminal background check
- References
- Credentials
- Medical exam or statement
- Proof of driver's license and driving history
- Job Title
- Duties and responsibilities
- Minimum level of education
- Physical demands of job
- Lines of authority
- Orientation
- Emergency procedures
- First aid and CPR
- Staff training
- Child abuse mandatory reporter
- Confidentiality
- Criminal Background check

JCICS

Comes under administrative rules, no mention or minimum standards

Montana

- Set minimum Qualifications for Staff
- Process for Screening applicants
- Training
- Orientation for the program, emergency procedures
- Confidentiality

UTAH

- Mandatory reporter of child abuse
- Minimum age of staff
- Minimum educational requirements
- CPR First Aid
- Training for Job
- Safety training
- Confidentiality

WYOMING

- Child abuse registry and criminal background check
- Proof of credentials
- CPR and First Aid
- Application
- Copy of Drivers license with driving history
- Previous employment and references
- Medical exam or statement of health
- Job Description
- Orientation to Program
- Minimum level of education and physical demands of job
- Lines of authority
- Written personnel policies
- Confidentiality

9. Physical Environment

COMMON AREAS OF AGREEMENT

- Clean water, proper disposal of garbage.
- Facility in good repair.
- Fire extinguishers, smoke detectors, emergency procedures, first aid kit.
- Health and Sanitation.

STANDARDS COMPARISON

NATSAP

Standards categorized as “PHYSICAL PLANT 10.0”

- The program/school will have facilities of a sufficient size, space, configuration, and condition to support the balanced integration of its programs and services, and manages its physical plant to keep risk within acceptable parameters for the participants as appropriate to the program/school’s mission and goals.

MAAPP

The same as NATSAP – see previous page

MONTANA

Standards categorized as “YOUTH GROUP HOME: ENVIRONMENTAL REQUIREMENTS 37.97.508 (1-10)”

- The youth group home shall provide an adequate and potable supply of water. The facility shall:
 - connect to a public water supply system approved by department of environmental quality; or
 - for youth group homes utilizing a nonpublic water system, the department hereby adopts and incorporates by reference the following circulars prepared by the department of environmental quality:
 - circular #11 for springs;
 - circular #12 for water wells;
 - circular #17 for cisterns.
 - These circulars set forth the relevant water quality standards for springs, water wells and cisterns. A copy of these circulars may be obtained from the Department of Environmental Quality, 1520 East Sixth Avenue, Helena, Montana.

- If a nonpublic water supply is used, the facility shall submit a water sample at least quarterly to a laboratory licensed by the department of environmental quality in order to determine that the supply does not contain microbiological contaminants.
- The water system shall be repaired or replaced when the supply:
 - contains unacceptable levels of microbiological contaminants; or
 - does not have the capacity to provide adequate water for drinking, cooking, personal hygiene, laundry, and water carried waste disposal.
- To insure sewage is safely disposed of, the youth group home shall either:
 - connect to a public sewer approved by the department of environmental quality; or
 - if a nonpublic system is utilized, the department hereby adopts and incorporates by reference bulletin 332, which sets forth standards for sewage disposal. A copy of bulletin 332 may be obtained from the Department of Environmental Quality, 1520 East Sixth Avenue, Helena, Montana.
 - The sewage system shall be repaired or replaced whenever:
 - it fails to accept sewage at the rate of application;
 - seepage of effluent from or ponding of effluent on or around the system occurs;
 - contamination of a potable water supply or state waters is traced to the system; or
 - a mechanical failure occurs.
- Solid waste disposal: The youth group home shall:
 - store all solid waste in containers which have lids and are corrosion resistant, fly tight, watertight, and rodent proof;
 - clean all solid waste containers frequently;
 - transport or utilize a private or municipal hauler to transport the solid waste at least weekly to a landfill site approved by the department of environmental quality in a covered vehicle or covered containers.
- A youth group home shall comply with the following structural requirements:
 - All rooms and hallways shall have adequate lighting.
 - Adequate space shall be provided for all phases of daily living, including recreation, privacy, group activities and visits from family, friends and community acquaintances.
 - Children shall have indoor areas of at least 40 square feet of floor space per child for quiet, reading, study, relaxing, and recreation. Halls, kitchens, and any rooms not used by children shall not be included in the minimum space requirement.
 - A sleeping room shall contain at least 50 square feet of floor space per person.
 - Bedrooms for single occupancy must have at least 80 square feet.
- Bathrooms shall be cleaned thoroughly with a germicidal cleaner at least weekly and more often if needed.
- Other areas shall be cleaned on a regular basis.
- There shall be hot and cold water available in the youth group home. Water temperature for hot water must be limited to 120° F or below.
- There shall be a washing machine and dryer available.

- The youth group home shall be equipped with a telephone. Telephone numbers of the hospital, police department, fire department, ambulance, and poison control center shall be posted by each telephone. Telephone numbers of the parent(s) and placing agency shall be readily available.
- Youth group homes shall have reasonable access to schools, churches, job opportunities, shopping, health and recreational activities.

UTAH

Standards categorized as "FIRE, SAFETY AND SANITATION R430-50-10"

- The owner shall have a disaster plan in case of fire, flood, earthquake, blizzard, power failure or other disasters that could create structural damage to the facility or pose a health hazard. The owner shall also have an emergency plan in the case of a missing child, death or serious injury to a child, which includes the name of a substitute caregiver in the event the owner must leave the residence for any reason.
 - A first aid kit shall be available in the home.
 - The owner shall maintain an operating telephone in the home, unless there is a utility failure.
 - The owner shall post the names and telephone numbers of the emergency medical personnel, fire department, police, and poison control by the telephone.
- The owner shall maintain fire extinguishers and smoke detectors in good operating condition on each floor occupied by children. Two exits, leading to an open space at ground level, shall be present to permit the orderly evacuation of children. If the basement is used to provide childcare, at least one exit shall be present leading to an open space at ground level.
- Each home shall have an outdoor play space which is safe, free from hazards, located away from traffic or water hazards, and is available on the premises or is easily and safely accessible to the home. If a fence is required to protect children from any traffic or water hazards then the fence shall be at least four feet high. If local ordinances conflict, the owner may request a variance from the Department. Any gaps within the fence and the bottom edges of the fence shall not be more than three and one-half inches above the ground.
- If children are diapered at the home, then diapering shall occur in an area separate from food storage, food preparation, and eating area. A smooth nonabsorbent diaper changing surface and a sanitary container for soiled and wet diapers shall be available.
- Caregivers and children shall wash their hands after using the toilet, before and after eating and before and after food preparation.
- Equipment and furniture must be durable, in good repair, structurally sound, and stable. Indoor and outdoor play spaces, toys and equipment shall be maintained in a safe manner to prevent injury to children.
- Dangerous items, such as sharp objects, medicines, plastic bags, and poisonous plants and chemicals, including household supplies, must be stored out of reach of children.

- Electrical outlets accessible to children four years of age and younger shall be protected or capped with safety devices.
- Hot water accessible to children shall not exceed 120 degrees Fahrenheit.
- There shall be adequate housekeeping to maintain a clean and sanitary home, to control, and eliminate the presence of insects, rodents, and other vermin on the premises.
- There shall be no firearms or other weapons accessible to children. Firearms and other weapons shall be stored separately from ammunition and all shall be in a locked cabinet or area during times when children are on the premises, unless the use is in accordance with UCA 53-5-701 Concealed Weapons Act, UCA 76-10-523 Persons Exempt from Weapons Laws or as otherwise authorized by law.
- If the owner has pets at the home:
 - the animals shall be clean and in good health;
 - the animals shall have current vaccination records available for all diseases transmissible to humans;
 - the animals shall have no history of dangerous or aggressive behavior;
 - the children shall not clean nor assist with the cleaning of animals, animal cages, pens or equipment;
 - the animal cages and equipment shall not be cleaned in food preparation or food storage areas; and
 - Children shall not be permitted to handle reptiles, including turtles and lizards.

WYOMING

- Facility Maintenance
- Uncrowded conditions
- Safety codes and regulations shall be documented
- Functional Safety
- Emergency procedures
- Physical environment and Equipment
- Special Health precautions
- Fire standards
- Health and Sanitation

10. Programming and Discipline or Behavior Management

COMMON AREAS OF AGREEMENT

- Written behavior management policy.
- No corporeal punishment.
- No cruel or unusual punishment, withholding food, humiliation or demeaning punishment.

STANDARDS COMPARISONS

NATSAP

Standards categorized as “BEHAVIOR MANAGEMENT PLAN 5.0-5.1.5”

- The program/school shall have a written Behavior Management Plan which describes:
 - How human dignity and rights will be respected in the application of behavior management practices.
 - Special treatment / intervention processes including such techniques as: seclusion, restraint, therapeutic holding, passive holding.
 - Procedures for handling emergency situations such as suicidality, abuse, assault, and runaway.
 - Acceptable and non-acceptable consequences.
 - On going training procedures for employees

MAAPP

- Develop and implement written policies that govern the use of behavior support and management techniques
- Fully inform program participants and his/her family regarding the behavior support system at the time of admission
- When faced with the necessity of applying interventions protect as much as possible the dignity and privacy of program participant
- Have a written policy regarding the appropriate use of group consequences
- A program must specify procedures and interventions that are prohibited. At a minimum, no denial of an adequate diet, corporeal punishment, or consequences implemented by another program participant without staff approval.
- Any behavior support management intervention that involves the use of any process or technique that includes unsupervised seclusion, restraint, therapeutic holding or passive holding as a regular component of behavior support except in emergencies.
- Describe how human dignity and rights will be respected in the application of behavior management practices.
- Procedures for handling emergency situations such as suicide abuse assault and runaway.
- Policy that describes the emergency use of any process such as seclusion restraint therapeutic holding or passive holding that are authorized when required in an emergency situation in which there is an imminent threat to life or physical safety of program participants, staff or others.
- On going training procedures of employees. Staffs are trained and competent in the use of the behavior support policy and procedures.

JCICS

None mentioned.

MONTANA

- Discipline: Each youth group home shall have a written policy for the discipline of children in care. Copies shall be made available to all provider staff, referring parties, parents, and the children. This policy shall include the philosophy of discipline, methods of discipline permitted, and the purpose of discipline as it relates to the ongoing learning and development process.
 - Discipline must not be physically or emotionally damaging.
 - There must be no cruel, harsh, or unusual punishment.
 - Verbal abuse of a child is prohibited.
 - No child of any age can be shaken or hit.
 - Children must not be denied meals, mail or contacts with their families as punishment.
 - No disciplinary practices of any sort shall be employed which are humiliating or degrading to the child or which undermine the child's self respect. Medication shall never be used to discipline or threaten children.
 - An incident report shall be completed by any childcare staff involved in an infraction of the discipline requirements. The incident report shall be placed in the child's file.

UTAH

Standards categorized as "CHILD DISCIPLINE R430-50-7."

- The owner shall inform all care givers, parents or guardians and children of expected conduct by setting clear and understandable rules.
- Disciplinary measures shall be implemented so as to encourage the child's self-control to reduce the risk of injury and any adverse health effects to self or others. Positive discipline measures include but are not limited to:
 - positive behavioral rewards;
 - other forms of positive guidance;
 - redirection; or time out.
- Discipline measures shall not include any of the following:
 - corporal punishment, including hitting, shaking, biting, pinching, or spanking;
 - restraining a child's movement by binding or tying;
 - using abusive, demeaning or profane language;
 - withdrawal of food or bathroom opportunities; or

- confining a child in a locked closet, room, or similar area; or
- forcing or withdrawing food, rest, or bathroom opportunities.

WYOMING

- Do not use corporal punishment
- Seclusion must be a safe secure individual room for temporary confinement.
- Philosophy of use
- Written policy about restraint and holding.

11. Safety

COMMON AREAS OF AGREEMENT

- Safe physical facility, which covers structures but also health and sanitation.
- Written policies which cover disaster, fire, and emergency procedures.
- Fire extinguishers, smoke detectors and evacuation plans.

STANDARDS COMPARISONS

NATSAP

Standards categorized as "SAFETY 8.0-8.3"

- The program/school shall have Plant, Technology and Safety Policies and Procedures containing the following:
 - A fire and disaster plan which includes the following:
 - Delineating responsibility of all employees in the event of fire or other disasters
 - A description of available emergency services, escape routes, relocation plans, and other contingency plans.
 - Documentation of all fire and emergency drills.
 - Policies concerning staff training for emergencies and access to emergency medical care.
 - A safety committee who will be responsible for risk management as well as training and implementation of emergent procedures.
- A policy or procedure for equipment maintenance and repair

- An Infectious Disease Control policy

MAAPP

- Must have safety policies and procedures which contain the following.
- Responsibility of all employees in the event of fire or other disasters
- A description of available emergency services, escape routes, relocation plans, and other contingency plans
- Documentation of all fire and emergency drills
- Policies concerning staff training for emergencies and access to emergency medical care
- A safety committee or individual will be responsible for risk management as well as training and implementation of emergency procedures
- A policy or procedure to equipment maintenance and repair
- An infectious disease control policy
- A policy on the transportation of participants that address the risk management.

JCICS

None mentioned.

MONTANA

Standards categorized as "YOUTH GROUP HOME: FIRE SAFETY 37.97.519"

- The department hereby adopts and incorporates by reference group R division 3 of the uniform building code which sets forth the fire safety regulations which shall apply to youth group homes. A copy of group R division 3 of the uniform building code may be obtained from the Department of Commerce, Building Codes Division, 1218 East Sixth Avenue, Helena, Montana.
- Smoke detectors approved by a recognized testing laboratory shall be located at stairways and in any areas requiring separation as set forth in the uniform building codes.
- A fire extinguisher approved by a recognized testing laboratory with a minimum rating of 2A10BC shall be readily accessible to the kitchen area.
- The date and signature of the person checking both the batteries in the smoke detector and the fire extinguisher shall be recorded and filed at the youth group home.
 - Smoke detector batteries shall be checked by the provider at least once each month and the batteries replaced at least once each year.
 - Fire extinguishers shall be checked by the provider at least quarterly.

- The staff shall be trained in the proper use of the fire extinguisher and the training recorded in the files.
- Staff and residents shall be instructed upon arrival in the procedure for evacuation in case of fire. The procedure shall be posted in a conspicuous place in the youth group home.
- All exits shall be clear and unobstructed at all times.
- Paint, flammable liquids and other combustible material shall be kept in locked storage away from heat sources or in outbuildings not used by the children.

UTAH

Standards categorized as "FIRE, SAFETY AND SANITATION R430-50-10."

- The owner shall have a disaster plan in case of fire, flood, earthquake, blizzard, power failure or other disasters that could create structural damage to the facility or pose a health hazard. The owner shall also have an emergency plan in the case of a missing child, death or serious injury to a child, which includes the name of a substitute caregiver in the event the owner must leave the residence for any reason.
 - A first aid kit shall be available in the home.
 - The owner shall maintain an operating telephone in the home, unless there is a utility failure.
 - The owner shall post the names and telephone numbers of the emergency medical personnel, fire department, police, and poison control by the telephone.
- The owner shall maintain fire extinguishers and smoke detectors in good operating condition on each floor occupied by children. Two exits, leading to an open space at ground level, shall be present to permit the orderly evacuation of children. If the basement is used to provide childcare, at least one exit shall be present leading to an open space at ground level.
- Each home shall have an outdoor play space which is safe, free from hazards, located away from traffic or water hazards, and is available on the premises or is easily and safely accessible to the home. If a fence is required to protect children from any traffic or water hazards then the fence shall be at least four feet high. If local ordinances conflict, the owner may request a variance from the Department. Any gaps within the fence and the bottom edges of the fence shall not be more than three and one-half inches above the ground.
- If children are diapered at the home, then diapering shall occur in an area separate from food storage, food preparation, and eating area. A smooth nonabsorbent diaper changing surface and a sanitary container for soiled and wet diapers shall be available.
- Caregivers and children shall wash their hands after using the toilet, before and after eating and before and after food preparation.
- Equipment and furniture must be durable, in good repair, structurally sound, and stable. Indoor and outdoor play spaces, toys and equipment shall be maintained in a safe manner to prevent injury to children.
- Dangerous items, such as sharp objects, medicines, plastic bags, and poisonous plants and chemicals, including household supplies, must be stored out of reach of children.

- Electrical outlets accessible to children four years of age and younger shall be protected or capped with safety devices.
- Hot water accessible to children shall not exceed 120 degrees Fahrenheit.
- There shall be adequate housekeeping to maintain a clean and sanitary home, to control, and eliminate the presence of insects, rodents, and other vermin on the premises.
- There shall be no firearms or other weapons accessible to children. Firearms and other weapons shall be stored separately from ammunition and all shall be in a locked cabinet or area during times when children are on the premises, unless the use is in accordance with UCA 53-5-701 Concealed Weapons Act, UCA 76-10-523 Persons Exempt from Weapons Laws or as otherwise authorized by law.
- If the owner has pets at the home:
 - the animals shall be clean and in good health;
 - the animals shall have current vaccination records available for all diseases transmissible to humans;
 - the animals shall have no history of dangerous or aggressive behavior;
 - the children shall not clean nor assist with the cleaning of animals, animal cages, pens or equipment;
 - the animal cages and equipment shall not be cleaned in food preparation or food storage areas; and
 - Children shall not be permitted to handle reptiles, including turtles and lizards.

WYOMING

- Functional safety: Regular maintenance, inspection to insure safety
- Fire and disaster plans. Staff and student awareness
- Collaboration with law enforcement and fire officials
- Fire evacuation, exits, fire extinguishers posted.
- Special Health: safe, hygienic and sanitary environment. Infection, bedding, kitchen, bathrooms, Safe storage of cleaning supplies Isolation of sick children.
- Food handling and storage. Safe manner.

JCAHO (Joint Commission on Accreditations of Healthcare Organizations)

The Joint Commission on Accreditation of Healthcare Organizations is a private, not-for-profit organization dedicated to continuously improving the safety and quality of care provided to the public. The Joint Commission is the nation's principal standards setter and evaluator for a variety of health care organizations, including behavioral health care models.

The mission of the Joint Commission on Accreditation of Healthcare Organizations is to continuously improve the safety and quality of care provided to the public through the provision of health care accreditation and related services that support performance improvement in health care organizations.

In the past two years JCAHO has worked with NATSAP to align accrediting standards that address the clinical model of behavioral/therapeutic 24-hour programs. There continues to be a high need and demand for the services these organizations provide.

The extensive accrediting standards are presented in two sections – Client-focused Functions and Organization Functions. These two sections contain the safety and quality focused standards, rationales, and elements of performance and scoring that apply to behavioral health organizations.

Client Focused standards have four functions:

1. Ethics, Rights, and Responsibilities
2. Provision of Care, Treatment and Services
3. Medication Management
4. Surveillance, Prevention, and Control of Infection (this is placed here because of its direct relationship to client care, treatment, and services.

Organization Functions standards have six functions:

1. Improving Organization Performance
2. Leadership
3. Management of the Environment of Care
4. Management of Human Resources
5. Management of Information
6. Behavioral Health Promotion

The JCAHO Accrediting process includes ethics, rights, and responsibilities. The goal of the ethics, rights, and responsibilities, function is to improve care, treatment, services, and outcomes by recognizing and respecting the rights of each client and by conducting business in an ethical manner.

JCAHO believes an organization's adherence to ethical care and business practices significantly affects the client's experience of and response to care, treatment, and services. The standards address the following processes and activities related to ethical care and business practices:

- Managing the organization's relationships with clients and the public in an ethical manner
- Considering the values and preferences of clients, including the decision to discontinue care, treatment, and services.
- Helping clients understand and exercise their rights
- Informing clients of their responsibilities in care, treatment, and services
- Recognizing the organization's responsibilities under law

ETHICS

Common Areas of Agreement

All organizations use ethical principals to acknowledge how they will operate
(NATSAP, MAAPP, JCIS, JACHO ALONG WITH ALL STATE LICENSING AGENCIES)

Policy and Procedures from Program Applications Compared to State Regulations

The purpose of this study is to show that many of the state regulations for programs are already addressed by the programs in Montana.

Using the policies that the programs submitted with their applications for registration, a comparison was made with these programs' policies and states' regulations. This study uses three states for the comparison: Montana, Wyoming, and Utah. Wyoming and Utah are among the approximately 18 states with regulations for private programs. Montana's regulations are for state run homes.

Working with 24 applications: 22 complete applications with policies – 1 has is incomplete missing some requested policies - 2 incomplete without policies and, so these 2 are not a part of this present study. Therefore this study is using 22 complete applications out of the 24.

1. Admission and Discharge Policies

COMMON AREAS OF AGREEMENT

- Written policy for admission and discharge
- File for each client
- What clients are not acceptable for the program
- How you would discharge a client – (not studied because not part of the application – does occur in policies)

POLICIES COMPARISONS

20 programs have policies for admissions – 2 programs did not include this section with their other policies – only 20 will be considered in this section on Admission.

Written policy for admission

What clients are not acceptable for the program:

MONTANA: Criteria for admissions and discharge

WYOMING: Written policy defining the children that will be admitted to the facility. Written policy defining the children or behaviors that is not appropriate for admission.

UTAH: Not mentioned

PROGRAMS:

19 out of 20 write about the criteria for admissions - 15 programs outline specifically in their policies the population they can and cannot serve – 4 programs do not list their criteria, but firmly state they have them and use them in conjunction with their screening process to determine if the student's needs could be met by the said program – 1 program outlines the procedures for a new student, but no criteria is mentioned.

File for each client:

MONTANA WYOMING UTAH: not mentioned

PROGRAMS:

6 of the 20 use the word "file" in their admission policies – 13 do not use the word "file" – but do clearly outline what should go into a file. It can be inferred that they must have a file in order to house all the required documentation – 1 does not mention what is included in their file – and does not contain any office procedures.

2. Medical Care

COMMON AREAS OF AGREEMENT

- Written policy
 - Access to appropriate medical care as the need dictates
 - How medication is handled, dispensed, and stored

POLICIES COMPARISONS

All 22 programs have written policies regarding medical care.

Access to appropriate medical care as the need dictates – the application did not ask for the entire medical policy. It only asked for medication management and access to care; however, some comparison can be made because some of the programs sent their entire or additional parts of their policy.

MONTANA:

- Every youth group home shall have access to the services of at least one physician
- Medical, dental psychiatric, psychological care and counseling services shall be obtained for the children as needed
- Complete physical and dental examination – *goes beyond the scope of the programs – parents would determine what their child would need – programs work with parents to assist them – group home employees serve as parents, so these guidelines are need for them.* (Not included in study but some programs stated they do have timetables for physical exams.)
- Provisions for treatment of diseases, remedial defects, or deformities and malnutrition shall be provided... - *goes beyond the scope of the programs – parents would determine what their child would need – programs work with the parents to assist them or students would not be admitted to program due to criteria, which directs whom the program and adequately service* (not included in study).

UTAH

- The owner shall inform the parents or guardians of all injuries and incidents that occur during the child's stay at the home.

- For any emergency that requires a response by emergency medical treatment providers, fatality, or hospitalization of a child in care, the owner shall: Notify the Department within 24 hours of occurrence...*This is not applicable to programs – however the programs do to notify parents.* (Not included in study.)
- The owner may not admit or provide care to a child without proof of current immunizations.... *This regulation is not composed in a manner that serves programs. The programs do require medical records and work with the parents to maintain proper health for their children. This regulation assumes that the owner takes the place of the parent exclusively.* (Not included in this study.)
- The owner shall inform the parents of communicable illnesses or parasites on the day of discovery.
- The owner shall ensure that the use and accessibility to illegal substances or sexually explicit materials are prohibited by any person anywhere on the premises during the hours of operation when children are in care. *Not addressed in these policies – addressed in code of conduct for employees or in policies regarding non-permitted items on the premise – not a medical issue per se.* (Not included in this study.)

Appropriate to make a comparison with:

WYOMING:

- Reference is made to adequate access to medical care and physician.

MONTANA:

- Every youth group home shall have access to the services of at least one physician
- Medical, dental psychiatric, psychological care and counseling services shall be obtained for the children as needed

UTAH:

- The owner shall inform the parents or guardians of all injuries and incidents that occur during the child's stay at the home.
- The owner shall inform the parents of communicable illnesses or parasites on the day of discovery.
- Access to care is not stipulated – but can be assumed by the regulations stated

Comparing to access to care and parental notification:

PROGRAMS:

19 programs provided their complete or part of their medical policies beyond medicine management. Out of the 19 programs – all 19 state that students have access to medical care and 5 stated the importance of notification of parents. Since the information of notification was not a requirement for this application process, it cannot be inferred that all 19 do not have this requirement in their policies. However, it is noteworthy to see the number who offered at least part of their medical policy, do have an alignment with this state regulation.

How medication is handled, dispensed, and stored

21 programs have policies regarding medication management.

MONTANA:

- All medication shall be kept in a place inaccessible to children, in their original containers, labeled with the original prescription label. (*Keeping the medication in the original containers infers these children are in a personal home. Programs may use their own licensed medical staff to repack the medication into weekly medication dispensers or require pharmacies to use bubble packs. The way the medication is packaged will depend on the number of students served.*)

WYOMING: none given

UTAH:

- If an owner chooses to administer medications, then the oral over-the counter and all prescription medications must be in the original or pharmacy container, have the original label, include the child's name, have child proof caps, and have written instructions for administration. (*See above comment for Montana.*)
 - The parent of guardian shall provide written permission for the administration of all medications. (*This is handled when the parent's complete the enrollment packet. Not considered part of the medical policy by programs. Difference situation for a program vs. youth home or childcare.*)
 - The owner shall report any adverse reaction to a medication or error in administration to the parent or legal guardian immediately upon recognizing the error or reaction.
 - The owner shall ensure that all medications are secure from access to children. If medications are required to be refrigerated, then they shall be stored in spill-proof packaging.
 - The owner will return all unused and out-of-date medications to the parent or guardian.

Storage:

Appropriate for comparison:

MONTANA:

- All medication shall be kept in a place inaccessible to children...

UTAH:

- The owner shall ensure that all medications are secure from access to children.

WYOMING: none given

PROGRAMS:

18 programs provide policies for securing medication from the teen students (Child proof caps do not apply here.) The 17 involve locking the medication in a way that the students do not have access – 1 is an outdoor program that did not use the word lock, but that staff should

keep medication at all times. The other 3 did not state where they house their medications – they focused on other aspects of medication dispersal.

UTAH:

- ...unused and out-of-date medications...

WYOMING AND MONTANA: do not address

PROGRAMS:

8 programs address the issue of unused or out-of date medications.

UTAH:

- If medications are required to be refrigerated, then they shall be stored in spill-proof packaging.

WYOMING AND MONTANA: do not address

PROGRAMS:

1 program addresses the issue of refrigeration for medications that require it. 18 programs address following the directions of licensed medical staff.

Handled

MONTANA:

- ...labeled with the original prescription...

UTAH:

- ...have written instructions for administration...

WYOMING: not addressed

PROGRAMS:

11 programs have policies that address accounting for the prescription's directions. Programs have policies regarding logging the distribution of medication, which would involve knowing the prescription -14 programs state that the medication log is under the direct supervision of a licensed medical staff. A total of 19 programs have policies regarding prescriptions and/or logs.

Dispensed

The states in this comparison do not mention dispersal. Programs are going beyond the requirements considered by these three states in their direct articulation of the procedure. However, it is important to note that in the case of Montana, the Department of Health and Human Services (DPHHS) defers to the Department of Labor and Industry Board of Pharmacy

regulations. Likewise, DPHHS defers to the Department of Labor and Industry Board of Nursing regulations on who can administer medication to children. The Montana rule is from the Boards' requirements and is only stated for clarification. In Montana the DPHHS sees no need to repeat different authorities ARM jurisdictions in full. The department simply makes a referral to whatever board has jurisdiction when a facility survey identifies concerns. It is then up to whatever determination a board may make regarding if it is a valid referral or not.

- 9 programs have policies for dispensing medication in such a way to try to prevent abuse in the medications use. The policies outline supervisions during the time a student takes his/her medication.
- Staff training in the dispensation - although states don't mention staff training, 6 programs specifically state in their policies that staff is trained to support the medication dispensation. This is not to infer that other programs do not train. They just did not articulate it in the materials given on medication management.

UTAH:

- ...recognizing the error ...

WYOMING AND MONTANA: do not directly address

PROGRAMS:

2 programs specifically mention errors. The logs, (14 programs) already mentioned, would also support this issue.

3.Participants Rights

COMMON AREAS OF AGREEMENT

- Written statements about rights and responsibilities
- Follow all applicable laws
- Protect fundamental human civil, constitutional, and statutory rights
- Respect human dignity
- Grievance procedures
- Privacy of information

Grievance Procedures:

MONTANA, WYOMING, UTAH: do not address

PROGRAMS:

With the application procedure, the only part of this section that can be addressed is the Grievance Procedures. 21 programs presented grievance procedure policies -18 programs have specific policies providing for student grievance procedures - 3 programs did not have policies for students, but provided them for staff. This could be due to confusion in the application as to what was requested.

Written statements about rights and responsibilities:

MONTANA, WYOMING, UTAH: do not address

PROGRAMS:

This was not a requirement of the application process; however since many programs shared more than what was required, and the grievance procedures were contained in a large policy of protection of rights, some programs shared policies regarding student rights. 7 programs had policies regarding students' rights.

4. Behavior Management

COMMON AREAS OF AGREEMENT

- Written behavior management policy
- No corporeal punishment
- No cruel or unusual punishment, withholding food, humiliation or demeaning punishment

MONTANA

- Discipline: Each youth group home shall have a written policy for the discipline of children in care. Copies shall be made available to all provider staff, referring parties, parties, parents, and the children. This policy shall include the philosophy of discipline, methods of discipline permitted, and the purpose of discipline as it relates to the ongoing learning and developmental process.
 - Discipline must not be physically or emotionally damaging.
 - There must be no cruel, harsh, or unusual punishment.
 - Verbal abuse of a child is prohibited.
 - No child of any age can be shaken or hit.
 - Children must not be denied meals, mail, or contacts with families as punishment.
 - No disciplinary practices of any sort shall be employed which are humiliating, or degrading to the child or which undermine the child's self respect. Medication shall never be used to discipline or threaten children.
 - An incident report shall be completed by any childcare staff involved in an infraction of the discipline requirements. The incident report shall be placed in the child's file.

UTAH:

- The owner shall inform all care givers, parents or guardians, and children of expected conduct by setting clear and understandable rules.
- Disciplinary measures shall be implemented so as to encourage the child's self-control to reduce the risk of injury and any adverse health effects to self or others. Positive discipline measures include but are not limited to:
 - positive behavioral rewards;
 - other forms of positive guidance;
 - redirection; or time out.

- Discipline measures shall not include any of the following:
 - corporal punishment, including hitting, shaking, biting, pinching, or spanking;
 - restraining a child's movement by binding or tying;
 - using abrasive, demeaning, or profane language;
 - withdrawal of food or bathroom opportunities; or
 - confining a child in a locked closet, room, or similar area; or
 - forcing or withdrawing food, rest, or bathroom opportunities.

WYOMING:

- Do not use corporal punishment
- Seclusion must be a safe and secure individual room for temporary confinement.
- Philosophy of use
- Written policy about restraint and holding

Written behavior management policy

MONTANA

- Discipline: Each youth group home shall have a written policy for the discipline of children in care. Copies shall be made available to all provider staff, referring parties, parties, parents, and the children. This policy shall include the philosophy of discipline, methods of discipline permitted, and the purpose of discipline as it relates to the ongoing learning and developmental process.

UTAH:

- The owner shall inform all care givers, parents or guardians, and children of expected conduct by setting clear and understandable rules.

WYOMING:

- Written policy about restraint and holding

PROGRAMS:

21 programs turned in their written policies concern behavioral management -16 programs outline the philosophy and/or the purpose in a clear manner -13 programs outlined examples of their methods of discipline - 11 programs outlined their policy regarding safe restraint, and 6 of these programs stated the licensed programs they used to guide them in their de-escalation techniques.

UTAH:

- Disciplinary measures shall be implemented so as to encourage the child's self-control to reduce the risk of injury and any adverse health effects to self or others. Positive discipline measures include but are not limited to:
 - positive behavioral rewards;
 - other forms of positive guidance;
 - redirection; or time out.

WYOMING AND MONTANA: not addressed

PROGRAMS:

15 programs specifically state their intention toward positive discipline - 6 programs outline a safe time out procedure with another 2 stating they use the procedure

No corporeal punishment

No cruel or unusual punishment, withholding food, humiliation or demeaning punishment

MONTANA:

Discipline must not be physically or emotionally damaging.

- There must be no cruel, harsh, or unusual punishment.
- Verbal abuse of a child is prohibited.
- No child of any age can be shaken or hit.
- Children must not be denied meals, mail, or contacts with families as punishment.
- No disciplinary practices of any sort shall be employed which are humiliating, or degrading to the child or which undermine the child's self respect. Medication shall never be used to discipline or threaten children.

UTAH:

- Discipline measures shall not include any of the following:
 - corporal punishment, including hitting, shaking, biting, pinching, or spanking;
 - restraining a child's movement by binding or tying;
 - using abrasive, demeaning, or profane language;
 - withdrawal of food or bathroom opportunities; or
 - confining a child in a locked closet, room, or similar area; or
 - forcing or withdrawing food, rest, or bathroom opportunities.

WYOMING:

- Do not use corporal punishment
- Seclusion must be a safe and secure individual room for temporary confinement.

PROGRAMS:

12 programs specifically stated policies against corporal punishment - 11 programs stated their policies oppose withdrawal of any thing essential for the quality of life (food, sleep etc.) - 10 programs had policies against verbal abuse and 10 against humiliation. These policies are from a variety of the 18 programs. In total 13 programs express concern about these forms of disciplinary actions.

MONTANA:

- An incident report shall be completed by any childcare staff involved in an infraction of the discipline requirements. The incident report shall be placed in the child's file.

UTAH AND WYOMING: not addressed

PROGRAMS:

11 programs have policies regarding incident reporting forms - 3 included the forms in their policies.

Conclusions:

- This small study indicates that private programs in Montana have many policies in place that are in alignment with regulations from states regarding programs.
- Because some of the verbiage of the regulations had to be ignored in this study, it also demonstrates that the way state regulations are designed may not fit the situations that occur in private programs.
- Because there were examples when many of the programs had a policy that the states didn't address, this study also indicates that the programs have a better sense of what is needed for their industry.
- Despite this small sample, it was demonstrated that the programs have many common points in their policies and therefore are capable of creating a structure of guidelines that would encompass the key points in regards to the public good and in regards to how programs can effectively serve youth.
- There were a few applications that did not include policies, and there were some policies that did not completely articulate all aspects presented in this study. No firm conclusions can be made from this, but it does indicate the possibility of a need for further articulation to the programs regarding what they need to consider when designing their policies and procedures.